

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

HAROLD JOSEPH KENDALL,)
individually and as the Administrator of)
the Estate of SHANE MIGUEL)
KENDALL,)

Plaintiffs,)

v.)

FULTON COUNTY, GEORGIA, a)
political subdivision of the State of)
Georgia; NAPHCARE, INC. an)
Alabama corporation,)
MICHAEL AGYEI, individually and,)
EDITH NWANKWO, individually.)

Defendants.)

CIVIL ACTION FILE NO.
1:23-cv-00416-JPB

CONSENT MOTION FOR PROTECTIVE ORDER

Plaintiff and Defendants pursuant to Fed. R. Civ. P. 26(c) move this Court to enter their Proposed Consent Protective Order in the above-styled case. In support of this Motion, the Parties submit the following:

1.

Plaintiff has served certain interrogatories and requests for production of documents on Defendants and intends to request certain depositions of Defendants

relating to information that can cause Defendants undue burden or expense if it becomes publicly available without condition or limitation.

2.

It is Defendants' contention that the information that could be potentially discoverable is likely to cause Defendants undue burden or expenses because it relates to policies and procedures, personnel records, investigation files, training programs, financial records, employment records, or other documents that contain personal, proprietary, or trade secret information.

3.

To avoid the potential for unnecessary litigation or waste of time regarding the requested information, Defendants and Plaintiffs wish to enter into a protective order with terms and conditions substantially similar to those listed in Fed. R. Civ. P. 26(c)(1).

4.

WHEREFORE, we request that this Court grant our Motion and enter the Proposed Consent Protective Order, which has been filed with this Motion.

This the 30th day of August, 2024.

PREPARED AND CONSENTED TO BY:

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/s/ Antonio E. Veal

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/s/ Rachel Kaufman (signed with
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